

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

DEC 21 2006 WH

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff

No. 02 C 3310

Judge Darrah

v.

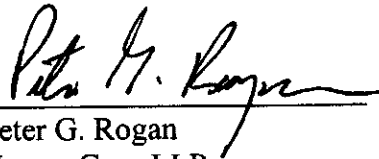
PETER G. ROGAN,

Defendant

AFFIDAVIT IN RESPONSE TO THE UNITED STATES'
MOTION FOR INSTALLMENT PAYMENT ORDER

Peter G. Rogan submits the attached affidavit of Peter Rogan in response to the United States' motion for installment payment order (doc. no. 231).

Respectfully submitted,



Peter G. Rogan
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File Number: 113817

December 11, 2006

VIA FAX and COURIER

Office of the United States Attorney
219 South Dearborn St.
5th Floor
Chicago, Illinois USA 60604

Attention: Joseph Stewart

Dear Sirs/Mesdames:

Re: Peter Rogan

We are responding to your letter of November 28, 2006 and the Citation to Discover Assets dated October 18, 2006.

With respect to your Motion for Rule to Show Cause for Failure to Appear for Citation Examination, we note that Mr. Rogan was never served with either the Citation to Discover Assets or the Motion for Rule to Show Cause for Failure to appear for a Citation examination, which was scheduled to take place in your offices on November 17, 2006.

As we discussed and you confirmed, you have already received numerous boxes of information concerning companies and limited partnerships in which Mr. Rogan had an interest from an office located in Merrillville, Indiana. We understand that this information included financial statements, general ledgers and tax returns for the following corporate entities:

1. Bainbridge Management Inc.;
2. Braddock Management LP;
3. Bainbridge Management LP;
4. Waldo Point Management;
5. Edgewater Property Co.;
6. PGR Properties Inc.; and
7. BFB.

Harper Grey LLP

We understand that additional personal information regarding Mr. Rogan's bank accounts and related statements was also contained in the boxes of information. We understand that this information included tens of thousands of pages of documents, much of it listed in the rider to your Citation to Discover Assets. During our conversation you refused to state specifically what documents had been recovered from the office.

Please provide us with a list of the information recovered from the office in Merrillville, Indiana so that we may understand what further information is required.

We advise that Mr. Rogan is not waiving solicitor/client privilege with respect to the documents in the office in Merrillville, Indiana. If, through inadvertence, privileged documents have been included, please forward those documents to us and confirm that you have not made copies and will not make use of those documents.

We understand that you have access to documents in the possession of the trustee in bankruptcy of Bainbridge Management LP and hundreds of thousands of documents produced to Sidley & Austin in litigation and that some of this information is listed in the rider to your Citation to Discover Assets.

We are sending you by Fedex a further 500 documents, being the documents in the possession and control of Mr. Rogan listed in the rider to the Citation to Discover Assets for the last three years. A listing of those documents follows. The numbers refer to the numbers on the rider to the Citation to Discover Assets:

1. Bank Statements

- (a) Peter G. Rogan, business account, Chase Account #8279, December 2005 through October 2006;
- (b) Peter G. Rogan business account, US Bank Account #8916, January 2005 through December 2005 and January 2006 through October 2006;
- (c) PGR Rogan Revocable Trust, Chase Account #2547, January 2004 through May 2006, various statements;
- (d) Peter Rogan, JP Morgan Account #0704, September 2006 through November 2006;
- (e) Peter Rogan Bainbridge Management Inc., Fifth Third Bank Account #9803 and 8897, January 2005 through June 2005;
- (f) Edgewater Property Co., Scudder Account #6252, January 2005 through December 2005.

2. Personal Federal and State Tax Returns

2003, 2004 and 2005

3. Applications for Loans or Credits - none personally
4. Applications for Insurance for Real or Personal Property - none personally
5. Financial Statements
 - (a) Bainbridge Management LP for year ended December 31, 2005;
 - (b) Bainbridge Management Inc. for year ended December 31, 2005 and period ended November 30, 2006;
 - (c) PGR Properties Inc., for year ended December 31, 2005 and period ended November 30, 2006;
 - (d) Edgewater Property Co., for period ended December 31, 2005 and period ended November 30, 2006;
 - (e) BFB Ltd. for year ended December 31, 2005 and period ended November 30, 2006.
6. General Ledgers
 - (a) Bainbridge Management LP for year ended December 31, 2005;
 - (b) Bainbridge Management Inc. for year ended December 31, 2005 and period ended November 30, 2006;
 - (c) PGR Properties for year ended December 31, 2005 and period ended November 30, 2006;
 - (d) Edgewater Property Co., for year ended December 31, 2005 and period ended November 30, 2006;
 - (e) BFB Ltd., for year ended December 31, 2005 and period ended November 30, 2006;
 - (f) PGR Business for year ended December 31, 2005 and period ended November 30, 2006;
7. Accounts Receivable and Loans payable
 - (a) accounts receivable - see corporate ledgers;
 - (b) note receivable from BFB Ltd. to Peter G Rogan Revocable Trust in the amount of \$109,198.00;
 - (c) note receivable from Edgewater Property Co. to PGR Properties Inc. in the amount of \$2,789,000 with accrued interest owing to PGR Properties in the

amount of \$140,546.73 and accrued interest owing to Peter G. Rogan as the Trustee of the Peter G. Rogan Revocable Trust in the amount of \$272,534.39.

8. Listings of Real or Personal Property - none
9. Safety Deposit Boxes - none
10. Stock Certificates, Certificates of Deposit and other Securities
 - (a) BFB Ltd.;
 - (b) Braddock Management Inc. n/k/a/ Bainbridge Management Inc.;
 - (c) Edgewater Property Co.;
 - (d) PGR Properties Inc.;
 - (e) no bonds or certificates of deposit;
 - (f) for other security, see other responses.
11. Promissory Notes

See 7 above
12. Titles to Motor Vehicles - none held personally, see various corporate records
13. Titles to Real Estate - none held personally, see various corporate records
14. Beneficial Interest in Trusts
 - (a) Peter G. Rogan Revocable Trust;
 - (b) Peter Rogan Irrevocable Trust;
 - (c) RPP Finance Trust.
15. Interests in Partnerships - none held personally, see various corporate records
16. Pay Stubs for Peter Rogan

January 2005 through October 2005
17. Any Pension Plans

TIAA/CREF Statement dated September 30, 2006

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18. Life Insurance Policies insured or beneficiary

Lincoln Natural Statement dated October 10, 2006

19. Documents for businesses and trusts

See above for Peter Rogan. Mr. Rogan may be a trustee of trusts for his sister and brother-in-law. Please advise if you would like information on these trusts

20. Other

see above

We are co-operating with you with respect to the production of documents. Mr. Rogan has attempted to produce the documents within his possession or control listed in the rider to the Citation. He will continue to supplement the documents produced to date if any further documents become available. If you are of the view that there are further documents that ought to be produced, in addition to those listed above, those previously located at the office in Merrillville, Indiana, those in the possession and control of the Trustee in bankruptcy of Bainbridge Management LP and those made available to you by Sidley & Austin, please advise.

Yours truly,

HARPER GREY LLP



Per: Katherine M. Wellburn

KMW/det

Encls.